

RICHARD M. CALLAHAN, JR.
35 North Lake Avenue, Suite 710
Pasadena, CA 91101
Telephone: (626) 202-4060
Telecopier: (626) 794-4676
State Bar No. 100446
Email: *rmcallahanjr@gmail.com*

Attorney for Defendant
CHARISSA MARIE CHOTARD

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**


UNITED STATES OF AMERICA,)	Case No. CR 24-570-WLH-16
)	
Plaintiff,)	EX PARTE APPLICATION FOR
)	PREPARATION OF A PRE-PLEA
vs.)	PROBATION REPORT FOR
)	DEFENDANT CHARISSA
CLAIRE HAVILAND, <i>et al.</i> ,)	CHOTARD; DECLARATION OF
)	COUNSEL
Defendants.)	
)	

TO THE HONORABLE WESLEY L. HSU:

Ex parte application is made by defendant Charissa Marie Chotard for a pre-plea report by the Probation Office solely on the issue of her criminal history. This application is based upon the attached declaration of Richard M. Callahan, Jr., and the files and records of this case.

Dated: November 16, 2024.

Respectfully submitted,
THE LAW OFFICES OF
RICHARD M. CALLAHAN, JR.

By: 
RICHARD M. CALLAHAN, JR.
Attorney for Defendant
CHARISSA MARIE CHOTARD

DECLARATION OF RICHARD M. CALLAHAN, JR.

I, Richard M. Callahan, Jr., hereby declare:

1. I am counsel of record for defendant Charissa Chotard in the case of *United States v. Claire Haviland, et al.*, CR 24-570-WLH-16. This matter is currently set for trial before this Court on February 24, 2026.

2. To better advise Ms. Chotard in this litigation, I request a court order for the preparation of a pre-plea report by the United States Probation Office, limited to an evaluation of Ms. Chotard's criminal history.

3. On or about November 16, 2024, Assistant United States Attorney Reema El-Amamy advised that she had no objection to this request.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed on November 16, 2024 in Los Angeles County, California.

By: 
RICHARD M. CALLAHAN, JR.